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*Counsel for Defendants Enterprise Leasing  
Company-West LLC dba Enterprise/ELCO;  
Enterprise Leasing Company-West LLC dba  
ALAMO; and ELCO Administrative Services  
Company*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LING CAI, individually; JING XU,  
individually; Z.X., a minor, by and through his  
Natural Parent, JING XU; TAMMY HARLESS,  
as Special Administrator of the ESTATE OF  
ZHONGPING ZHOU, deceased;

Plaintiffs,

v.

ENTERPRISE LEASING COMPANY-WEST  
LLC dba ENTERPRISE dba ALAMO; ELCO  
ADMINISTRATIVE SERVICES COMPANY;  
ACE AMERICAN INSURANCE COMPANY;  
ESIS INC, dba CHUBB NORTH AMERICAN  
CLAIMS; CHUBB SERVICES  
CORPORATION dba CHUBB NORTH  
AMERICAN CLAIMS; CHUBB NATIONAL  
INSURANCE COMPANY; AND CHUBB  
INDEMNITY INSURANCE COMPANY;  
DOES I through X, inclusive; and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:23-cv-00050-ART-NJK

**ORDER TO EXTEND TIME TO  
RESPOND TO SECOND  
AMENDED COMPLAINT**

[FIRST REQUEST]

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1 Defendants Enterprise Leasing Company-West LLC dba Enterprise dba Alamo and  
2 ELCO Administrative Services Company (collectively, the “Enterprise Parties”) by and  
3 through their counsel, the law firm of Greenberg Traurig, LLP, and Defendant ACE American  
4 Insurance Company (“AAIC”), improperly and collectively named as ACE American  
5 Insurance Company; ESIS Inc, dba Chubb North American Claims; Chubb Services  
6 Corporation dba Chubb North American Claims; Chubb National Insurance Company; and  
7 Chubb Indemnity Insurance Company (collectively “ACE Defendants”), by and through their  
8 counsel, Clyde & Co. US LLP, and Plaintiffs Ling Cai, Jing Xu, Z.X., Tammy Harless, as  
9 Special Administrator of the Estate of Zhongping Zhou (“Plaintiffs”), by and through their  
10 counsel, The 702 Firm, (collectively, the “Parties,”) hereby stipulate to extend the deadline for  
11 Defendants to file their respective responses to the Second Amended Complaint to October 10,  
12 2023 to permit the Parties to schedule and attend mediation.

13 Currently, Defendants’ responses to the Second Amended Complaint are due on  
14 August 15, 2023. However, the Parties believe that mediation could potentially lead to a global  
15 settlement of this matter without further litigation. The parties are discussing the possibility of  
16 an early mediation, and a proposed mediation date with the Hon. Jackie Glass (ret. has been  
17 presented for September 21, 2023. The parties anticipate that finalizing this potential mediation  
18 in the coming days. As such, the Parties stipulate and agree to this extension so that they may  
19 attend mediation in September 2023 and avoid potentially unnecessary fees and costs. Such  
20 mediation may obviate the need for such a response. The Parties agree that Defendants will

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1 have until **October 10, 2023**, to file either a joint status report regarding settlement or their  
2 responses to Plaintiff's Second Amended Complaint in the event mediation is unsuccessful.

3 This stipulation is made in good faith and not for purposes of delay.

4 **IT IS SO STIPULATED.**

5 DATED this 11<sup>th</sup> day of August, 2023.

6 **GREENBERG TRAURIG, LLP**

7 /s/ Eric W. Swanis

8 Eric W. Swanis, Esq.  
9 Nevada Bar No. 6840  
10 Bethany L. Rabe, Esq.  
11 Nevada Bar No. 11691  
12 10845 Griffith Peak Drive, Suite 600  
13 Las Vegas, Nevada 89135  
14 **Counsel for Enterprise Defendants**

DATED this 11<sup>th</sup> day of August, 2023.

**THE 702 FIRM**

/s/ Michael C. Kane

Bradley J. Meyers  
Nevada Bar No. 8857  
Michael C. Kane  
Nevada Bar No. 10096  
3753 Howard Hughes Parkway  
Suite 200  
Las Vegas, Nevada 89169  
**Counsel for Plaintiffs**


14 DATED this 11<sup>th</sup> day of August, 2023.

15 **CLYDE & CO US LLP**

16 /s/ Dylan P. Todd

17 Amy M. Samberg  
18 Nevada Bar No. 10212  
19 Dylan P. Todd  
20 Nevada Bar No. 10456  
21 7251 W. Lake Mead Blvd., Suite 430  
22 Las Vegas NV 89128  
23 **Counsel for Ace Defendants**

24 **IT IS SO ORDERED.**

25   
UNITED STATES MAGISTRATE JUDGE

26 DATED: August 14, 2023  
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